

CIVIL RIGHTS COMPLAINT  
42 U.S.C. § 1983

RECEIVED  
SDNY PRO SE OFFICE  
2023 MAR -9 PM 3:06

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X  
Jason Williams, #20A0163,  
Full name of plaintiff/prisoner ID#

**(AMENDED COMPLAINT)**  
**22-CV-04224(PAE)(SDA)**

Plaintiff,

JURY TRIAL DEMAND  
YES \_\_\_\_\_ NO \_\_\_\_\_

-against-

Luis Alana, #260; Karene Taylor, #18454; Anne Hinton, #17108  
Carlton Tabuteau, #1766; Efuru Crooks, #1227  
Raymond Zimmerman, #6637; Jeamie Santiago, 7830.

Enter full names of defendants  
[Make sure those listed above are  
identical to those listed in Part III.]

Defendants.  
-----X

I. Previous Lawsuits:

- A. Have you begun other lawsuits in state or federal court dealing with the same facts involved in this action or otherwise relating to your imprisonment? Yes ( ) No **(XX)**
- B. If your answer to A is yes, describe each lawsuit in the space below (If there is more than one lawsuit, describe the additional lawsuits on another piece of paper, using the same outline.)

1. Parties to this previous lawsuit:

Plaintiffs: \_\_\_\_\_  
\_\_\_\_\_

Defendants: \_\_\_\_\_  
\_\_\_\_\_

2. Court (if federal court, name the district;  
if state court, name the county)  
\_\_\_\_\_

3. Docket Number: \_\_\_\_\_

4. Name of the Judge to whom case was assigned: \_\_\_\_\_

5. Disposition: (for example: Was the case dismissed? Was it appealed? Is it still pending?)  
\_\_\_\_\_

6. Approximate date of filing lawsuit: \_\_\_\_\_

7. Approximate date of disposition: \_\_\_\_\_

II. Place of Present Confinement: Wallkill Cor. Fac. Route 208, Box G.  
Wallkill, NY 12589

A. Is there a prisoner grievance procedure in this institution? Yes (XX) No ( )

B. Did you present the facts relating to your complaint in the prisoner grievance procedure? Yes (XX) No ( ) NA

C. If your answer is YES,

1. What steps did you take? Grieved and Appealed was denied  
\_\_\_\_\_  
\_\_\_\_\_

2. What was the result? Grievance and Appeal was denied  
\_\_\_\_\_  
\_\_\_\_\_

D. If your answer is NO, explain why not A Jane Doe Attorney advised Plaintiff by Phone (347-891-4841) that she had filed all grievances and appeals. Further ordering plaintiff to send medical records and they would follow up on the situation but never did.

E. If there is no prison grievance procedure in the institution, did you complain to prison authorities? Yes ( ) No ( ) NA

F. If your answer is YES,

1. What steps did you take? \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

2. What was the result? \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

III. Parties:

(In item A below, place your name in the first blank and place your present address in the second blank. Do the same for additional plaintiffs, if any.)

A. Name of plaintiff Jason Williams #20A04224

Address Route 208, Box G., Wallkill, NY 12589

(In item B below, place the full name and address of each defendant)

B. List all defendants' names and the addresses at which each defendant may be served. Plaintiff must provide the address for each defendant named.

Defendant No. 1

Luis Alana, Shield No. 260

16-00 Hazen St., East Elmhurst, NY 11370

Defendant No. 2

Karene Taylor, Shield No. 18454

16-00 Hazen St., East Elmhurst, NY 11370

Defendant No. 3

Carlton Tabureau, Shield No. 1766

16-00 Hazen St., East Elmhurst, NY 11370

Defendant No. 4

Efuru Crooks, Shield No. 1227

16-00 Hazen St., East Elmhurst, NY 11370

Defendant No. 5

Anne Hinton, Shield No. 17108

16-00 Hazen St., East Elmhurst, NY 11370

**(See attached For Further Names)**

[Make sure that the defendants listed above are identical to those listed in the caption on page 1].

**List All Defendants' names and addresses at which each defendant may be served**

**Defendant No 6. Raymond Zimmerman, Shield No. 6637**

**16-00 East Elmhurst, NY 11370**

**DefendantNo. 7 Jeammie Santiago, Shield No. 7830**

**16-00 Hazen St., East Elmhurst, NY 11370**

Plaintiff was housed in a "Gang Unit"

IV. Statement of Claim:

(State briefly and concisely, the facts of your case. Include the date(s) of the event(s) alleged as well as the location where the events occurred. Include the names of each defendant and state how each person named was involved in the event you are claiming violated your rights. You need not give any legal arguments or cite to cases or statutes. If you intend to allege a number of related claims, number and set forth each claim in a separate paragraph. You may use additional 8 1/2 by 11 sheets of paper as necessary.)

**Plaintiff was housed in housing unit, "3 North in the OBCC on Rikers**

**Island located at, 16-00 Hazen St. East Elmhurst, NY 11370.**

**Inmate Daquan Banks was housed in housing unit "5 South in the OBCC on Rikers Island at 16-00 Hazen St., East Elmhurst, NY 11370.**

**Both Housing Unit were listed as "Gang Units." As such, all the inmates that was housed in the above Gang Units was required to be separated at all times. The separation included, visit rooms, Court pens, Mess Halls, Barber Shops, and Hallways. This list listing is not all in conclusive to to other areas within and outside of the Facility.**

**While Plaintiff was on work detail with defendant Anne Hinton, (hereinafter, Hinton), in the hallways. While plaintiff was conducting his work detail, inmate Daquan Banks, (hereinafter, Banks) was being escorted by defendant's**

**(See Attached)**

IV. A If you are claiming injuries as a result of the events you are complaining about, describe your injuries and state what medical treatment you required. Was medical treatment received?

**Plaintiff was cut with a sharp object on the left side of the face. The cut consist of a cut approximately four to five inches long that developed into a Keloid scar that causes Plaintiff extreme pain and emotional damage.**

STATEMENT OF CLAIM CONTINUE

Luis Alana, (hereinafter, Alana), Karene Tayloer, (hereinafter, Taylor), Carlton Tabuteau, (hereinafter, Tabuteau), Efuru Crooks (hereinafter, Crooks), Raymond Zimmerman, (hereinafter, Zimmerman), and Jeammie Santiago, (hereinafter, Santiago), on the opposite side of the hallway.

Plaintiff was reporting to his work detail being escorted by defendant, Anne Hinton, (hereinafter, Hinton).

All the above defendant know that Plaintiff and Banks where is united classified as "gang units" and were required to be separated at all time when ever they are outside of their units. The gang units housed inmates who are gang related, are found guilty of assaults on other inmate, are found guilty of position of dangerous weapons, and assaults on Staff.

All the inmates who are housed in the gang unites are required to have special escorts and secured when ~~ever~~ they leave their prospective units at all times. Inmate Bank was not secured by the above defendants even though defendant's knew that he was assigned to the gang unit and was found guilty of a number of serious charges in the past.

The above defendant's allow inmate Banks to come across the hallway and assault plaintiff by cutting him on the left aide of his face causing an approximately 4-to-5 inch wound .

The defendant's are deliberate indifference, has failed to by properly train, supervise and discipline respect to the policies and procedures mandated the special escort of dangerous inmate who are housed in special housing units such as gang units.

the actions, inactions, and conduct of the individual defendants were the direct result of their failure in being properly trained in connection with well established crisis intervention procedures related to escorting inmates who are housed in gang units to ensure that correctional officers follow established crisis intervention procedures.

Plaintiff by reasons on his injuries has and continue to suffer extreme pain, disfigurement and emotion damage for the rest of his life, for the direct and proximate cause of defendant's actions, inaction and conduct.

V. Relief:

State what relief you are seeking if you prevail on your complaint. "

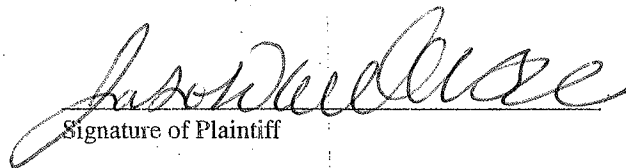
**\$3,000,000.00 (Three Million) Compensatory Damages as to all defendants;**

**\$3,000,000.00 (Three Million) Punitive damages as to all defendants;**

**and other and further relief as may appear just and appropriate.**

I declare under penalty of perjury that on 03/2/23, I delivered this  
(Date)  
complaint to prison authorities to be mailed to the United States District Court for the Eastern  
District of New York.

Signed this 2 day of March, 2023. I declare under penalty of  
perjury that the foregoing is true and correct.

  
Signature of Plaintiff

**Wallkill Corr. Fac.**

Name of Prison Facility

**Route 208, Box G**

**Wallkill, New York 12589**

Address

20A0163  
Prisoner ID#



Jason Williams 20A0163  
Wallkill Correctional Facility  
Route 208, Box G  
Wallkill, NY 12589

RECEIVED

2023 MAR -8 PM 4:18

CLERK'S OFFICE  
U.S. COURT OF APPEALS

WALLKILL

NEOPOST

03/03/2023

US POSTAGE \$001.50



CORRECTIONAL FACILITY

LEGAL MAIL

ZIP 12589  
041M11280544

RECEIVED  
SDNY PRO SE OFFICE

2023 MAR -9 PM 2:40

RECEIVED  
SDNY PRO SE OFFICE

Pro SE Clerk Officer  
C/O Hon. Stewart D. Aaron  
U.S. Magistrate Judge  
Southern District of New York  
40 Foley Square  
New York, NY 10007

